

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

DANIEL GRAND, )  
Plaintiff, )  
vs. ) Case No. 1:22-CV-01594  
UNIVERSITY HEIGHTS, ET AL )  
Defendants. )  
\_\_\_\_\_  
)

**UNOPPOSED MOTION FOR CONTINUANCE OF CASE**  
**MANAGEMENT CONFERENCE**

TO THE HONORABLE COURT:

Undersigned counsel moves for a continuance for the Case Management Conference scheduled for January 19, 2023. On December 8, 2022, undersigned counsel filed an unopposed motion to continue the case management conference scheduled for January 10, 2023 (ECF No. 11), due to a trial scheduled for January 9, 2023, regarding a case in the United States District Court for the District of Columbia, *United States v. Barnett*, Case No. 1:21-cr-0038 (D.D.C. 2021).

When ECF No. 11 was filed, undersigned counsel did not anticipate that the trial would last longer than a week, at most. In fact, at a pre-trial conference held in that case on January 4, 2023, the parties and the Court jointly anticipated the same. However, the trial turned out to be more complicated than anyone expected. As late as Tuesday, undersigned counsel anticipated that the defense would rest by Wednesday afternoon at the latest, and there would be no conflict with the Case Management Conference on Thursday morning. However, the Government's case in chief went longer than anticipated, and the defense only presented its first witness on Wednesday afternoon. The

trial will proceed on Thursday morning and therefore undersigned counsel has an unforeseen conflict with the Case Management Conference scheduled for the same.

Undersigned counsel conferred with opposing counsel for all parties, and they do not oppose this motion.

Due to the unforeseen circumstances, undersigned counsel respectfully requests that this Honorable Court allow a continuance and reset the Case Management Conference for a date to be determined.

Dated: January 18, 2023

Respectfully submitted,

/s/ Jonathan Gross  
Jonathan Gross  
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**CERTIFICATE OF SERVICE**

I certify that on January 18, 2023, a true and correct copy of the above and foregoing document will be served by electronic mail to counsel for Defendants.

/s/ Jonathan Gross  
Attorney for Plaintiff

**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with opposing counsel and the motion is unopposed.

/s/ Jonathan Gross  
Counsel for Plaintiff